

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE AMERICAN BUSINESS  
FINANCIAL SERVICES INC.  
NOTEHOLDERS LITIGATION**

**Master File No. 05-232**

**PLAINTIFFS' MOTION FOR AN ORDER TO APPROVE DISTRIBUTION  
OF THE SETTLEMENT FUND**

Plaintiffs, by their counsel, hereby move this Court for entry of the accompanying proposed Distribution Order, approving distribution of the Net Settlement Fund *pro rata* to authorized claimants, allowing late-filed claims, disallowing rejected claims, approving the payment of settlement administration fees and costs from the Settlement Fund, approving settlements with SPCP Group, LLC and Hain Capital, approving the payment of monies remaining after such payments (and any additional administrative expenses) to a charitable organization(s), approving Heffler's ultimate destruction of documents, and confirming releases contained in the Settlement Agreement, the Proof of Claim form and the Court's order of November 21, 2008, as further explained in the accompanying memorandum.

Dated: January 21, 2010

Respectfully,

/s/ TODD S. COLLINS

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